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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Interconnected Voice Over Internet Protocol 911 Compliance Letter, *IP-Enabled Services*, WC Docket No. 04-36; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196

Dear Ms. Dortch:

MCI Inc. (“MCI”) submits this letter detailing MCI’s¹ compliance with the 911 requirements outlined in the *VoIP E911 Order*² and enumerated in the recent *Compliance Letter Public Notice*.³ In addition, this letter provides an update⁴ to the Commission on MCI’s new software-based processes that will automatically detect when a subscriber has attempted to move his or her VoIP service from its Registered Location.⁵

¹ MCI through its operating subsidiaries offers two interconnected VoIP services. Neighborhood Broadband Calling is a mass market trial offering launched on a limited, trial basis in June 2005. MCI Advantage is a complete convergence solution that consolidates business customers’ voice and data applications over a single data network. MCI Advantage is available in the United States and internationally. This letter addresses MCI’s compliance efforts for its domestic customers.

² *IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (rel. June 3, 2005)(*VoIP E911 Order*).

³ *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36, 05-196 (rel. Nov. 7, 2005) (“*Compliance Letter Public Notice*”).

⁴ See Letter from Richard S. Whitt to Marlene H. Dortch, *IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 04-36 and 05-196 (Oct. 21, 2005) (MCI committed to provide monthly compliance updates regarding implementation of the auto-detection process).

⁵ Letter from Richard S. Whitt to Marlene H. Dortch, *IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 04-36 and 05-196 (Oct. 21, 2005).

When MCI detects a possible move, MCI will take steps to suspend the subscriber unless and until the subscriber verifies that he or she is at the Registered Location or until MCI has processed a requested address change to a location at which MCI can provide that specific subscriber with 911 service. The Commission has praised MCI's automatic detection solution and "strongly encourage[d] other providers to adopt similar measures."⁶

All of MCI's interconnected VoIP subscribers have 911 capability at their fixed, Registered Location, as they have since the inception of MCI's interconnected VoIP services. Furthermore, MCI will not add new customers to areas where it does not have 911 capability, and MCI will continue to take steps to advise its interconnected VoIP customers that their service currently is a fixed service to be used only at their Registered Location.

Also, as we have reported, MCI has notified all of its interconnected VoIP customers⁷ of the 911 limitations on our interconnected VoIP services. MCI has obtained acknowledgements from more than 90 percent of its customers and is continuing to pursue acknowledgments from those few who have not yet responded.

The following information is provided in response to the detailed requests, set forth below in bold, in the *Compliance Letter Public Notice*. (Unless otherwise noted, responsive information applies both to MCI Advantage and Neighborhood Broadband.)

- 1. 911 Solution: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.**

All (100%) of MCI interconnected two-way VoIP subscribers have 911 service in compliance with the rules established in the *VoIP 911 Order*.

Further, the detailed description of the technical solution should include the following components:

⁶ *Compliance Public Notice*, at 5.

⁷ For the Advantage product, "customers" refers to the corporate customer with whom MCI has contracted to provide service, whereas "end users" or "subscribers" refer to the individual user of the service. A corporate customer will have more than one end user. For the Neighborhood Broadband Calling trial, "customers," "end users," and "subscribers" all refer to the residential end user and are used interchangeably.

- a. **911 Routing Information/Connectivity to Wireline E911 Network:** A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, “all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.”⁸ If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

MCI, either directly or through its vendor, is transmitting all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority using the selective router, trunk lines, and other elements of the Wireline E911 network. For its Advantage product, MCI uses dedicated 911 network facilities, and MCI has interconnected with approximately 34% percent of the selective routers in the United States as of Nov. 28, 2005. For its Neighborhood Broadband trial, through its vendor, MCI has interconnected with 63% of the selective routers in the United States as of Nov. 28, 2005.

- b. **Transmission of ANI and Registered Location Information:** A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller’s ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider’s service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller’s ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

⁸ *VoIP 911 Order*, 20 FCC Rcd at 10269-70, ¶ 42 (footnote omitted).

Via the Wireline 911 network, MCI transmits a 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing the information. MCI supports the display of ANI and automatic location information for all PSAPs connected to the selective routers within the areas where MCI provides interconnected VoIP service. MCI transmits the ANI and Registered Location information for all (100%) its interconnected VoIP customers to answering points that are capable of receiving that information.

One-hundred percent (100%) of the answering points within MCI's SIP enabled service area for MCI Advantage and within MCI's vendor's 911 service area for Neighborhood Broadband are capable of receiving and processing ANI and Registered Location information.

- c. **911 Coverage:** To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

MCI is in full compliance with the requirements of the *VoIP 911 Order*.

2. **Obtaining Initial Registered Location Information:** A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

MCI has obtained and continues to obtain Registered Location information for all (100%) its customers when customers register for MCI's interconnected VoIP service, whether done online or via telephone.

3. **Obtaining Updated Registered Location Information:** A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for

updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

MCI's subscribers may contact MCI customer service using their interconnected VoIP equipment (*e.g.*, telephone) and register a new location within MCI's 911 coverage area through MCI's standard order processing procedures.

- 4. Technical Solution for Nomadic Subscribers: A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.**

MCI's service is currently a fixed service. As such, MCI's automatic detection mechanism enables MCI to detect when a customer has moved his or her interconnected VoIP service to a new location. Upon detection, MCI will take steps to suspend the customer unless and until MCI is able to confirm that the equipment is still at the same location, or the customer reestablishes service at a new registered location within MCI's 911 coverage area at which MCI can provide that subscriber with 911 service. MCI anticipates implementing additional enhancements, including steps to minimize false positives and introduction of an easy-to-use voice-prompt system as part of the recorded intercept message.

Respectfully submitted,

Amy Wolverton

cc: Kathy Berthot
Janice Myles
Best Copy and Printing, Inc.